

Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Dyer, Ellis, Joseph & Mills, P.C. 600 New Hampshire Avenue, NW, Suite 1000 Washington, DC 20037	2. Registration No. 4121
--	-----------------------------

3. Name of foreign principal Greek Shipping Cooperation Committee ("GSCC")	4. Principal address of foreign principal #6 Middlesex Street London E1, U.K.
---	---

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☒ Committee

☐ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual—State his nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

The GSCC, originally created just before World War II, deals with problems of all kinds affecting ships, regardless of flag, in which Greek nationals have an interest. Committee headquarters are in London.

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐
- Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Financed by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☒
- Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

The GSCC is not owned, directed, controlled, financed, or subsidized by a foreign government or foreign political party.

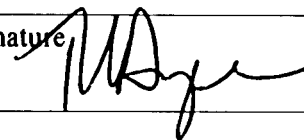
It is a "friendly society," operated and financed by its members, all of whom are from the Greek shipping community.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it. See above.

Date of Exhibit A
May 20, 1991

Name and Title
Thomas M. Dyer, President

Signature



INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Name of Registrant

Dyer, Ellis, Joseph & Mills, P.C.

Name of Foreign Principal

Greek Shipping Coordination Committee

Check Appropriate Boxes:

1. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2. ☒ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Registrant will represent the Greek Shipping Coordination Committee ("GSCC") in making known its position and recommendations regarding the compensation for oil pollution damage from ships operating in waters subject to U.S. jurisdiction (including insurance cover and establishment of funds). This will be done before the Congress of the United States and various Executive Branch agencies and departments.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Registrant will engage in informal advocacy and, where appropriate, formal appearances before the U.S. Congress and certain Executive Branch agencies and departments. Where appropriate, this will be done in cooperation with other representatives of the maritime industry and with public interest representatives.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The activities described above may constitute political activities, as they will involve contacts with government officials in an attempt to persuade them to take constructive action toward provision of a suitable compensation mechanism for oil pollution risks.

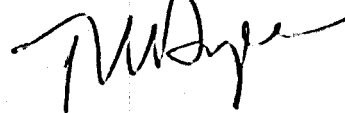
Date of Exhibit B

May 20, 1991

Name and Title

Thomas M. Dyer
President

Signature



¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

EMBIRICOS SHIPBROKERS LIMITED

E. G. E. Embiricos (Chairman)
P. A. Embiricos-Coumoundouros (Greek)
T. W. Jaques
A. G. Gounaris

Commonwealth House
1-19 New Oxford Street
London WC1A 1NU

And at the Baltic

Telephone : 071-404 0420
071-872 9661 Dry Cargo
071-872 9388 Tankers
Telex : 8812792 Epembi G
Facsimile : 071-872 9387
Cables : Embiship London WC1
Registered in England No. 958112

Mr. Jim Ellis,
Messrs. Dyer, Ellis, Joseph and Mills,
600 New Hampshire Avenue, NW.,
Suite 1000,
Washington, D.C., 20037,
USA

May 8th.1991

BY FAX 0101 202 944 3068 (& Mail)

Dear Mr. Ellis,

U.S. OIL POLLUTION LEGISLATION

I am writing to you further to my letter of the 25th. April 1991 and my conversation with Admiral Sid Wallace on Tuesday, the 7th. May 1991.

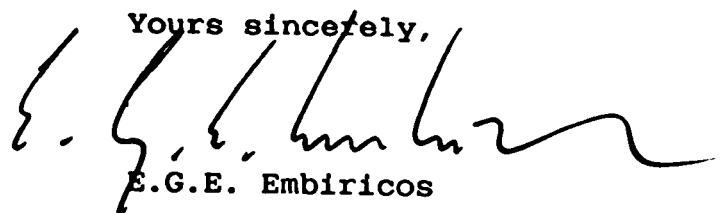
I am pleased to be in a position to confirm instructions on behalf of the Greek Shipping Co-operation Committee for your firm to make representations to the U.S. Coast Guard, to Secretary Skinner and possibly to other U.S. Government Departments, in accordance with the position paper of the Union of Greek Shipowners and the Greek Shipping Co-operation Committee, which was enclosed with my aforesaid letter of the 25th. April.

Admiral Wallace suggested that initially, we consider a three month agreement with a monthly fee ceiling of US\$15,000, inclusive of expenses (except for travel outside the United States). The Greek Shipping Co-operation Committee is agreeable to such an arrangement.

Admiral Wallace advised me that he would be in London between the 11th. and the 24th. of May and I would be grateful if arrangements could be made for us to meet with him at a mutually convenient time, to discuss how matters should be progressed.

With kind regards.

Yours sincerely,



E.G.E. Embiricos

cc John Hadjipateras, Esq.
Chairman, GSCC.
(FAX 375 2046 & Mail)

DYER, ELLIS, JOSEPH & MILLS

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

WATERGATE - SUITE 1000
600 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON, D. C. 20037
(202) 944-3000

TELECOPIER (202) 944-3068
TELEX/TWX 5106007910 USLAW
SIDNEY A. WALLACE
COUNSEL

THOMAS M. DYER
JAMES B. ELLIS II
MICHAEL JOSEPH
THOMAS L. MILLS
WAYNE A. KEUP
E. ALEX BLANTON
WARREN L. DEAN, JR.
MARGARET T. CHAO
BRIAN A. BANNON
DUNCAN C. SMITH III
BRETT M. ESBER
CONSTANTINE G. PAPAVIZAS
DEBRA M. ROBBINS*
SHERIDEN T. BLACK
LINDA K. ROSENTHAL
JOSEPH O. CLICK
NORMAN F. LENT III
R. ANTHONY SALGADO
KATHLEEN M. TENOEVER*
EMILY W. STREETT
MARGARET E. SMITH*
GLENN P. HARRIS
GEOFFREY S. SWANSON
LAURIE L. CRICK*

*NOT ADMITTED IN D.C.

May 10, 1991

Mr. E.G.E. Embiricos
Chairman
Embiricos Shipbrokers Limited
Commonwealth House
1-19 New Oxford Street
London WC1A 1NU

Re: U. S. Oil Pollution Legislation

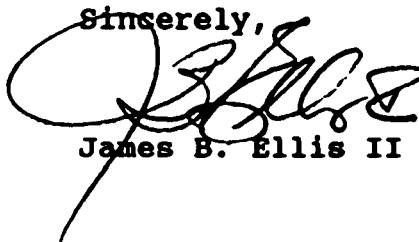
Dear Mr. Embiricos:

We are pleased to accept your instructions on behalf of the Greek Shipping Co-operation Committee to pursue discussions along the lines as set forth in your letter to Admiral Wallace of 25 April 1991.

Admiral Wallace will be contacting you in the next few days to set up a meeting with Mr. Hadjipateras and you at which he and Mr. Warren Dean of our office will discuss the assignment in more detail.

With kind regards.

Sincerely,



James B. Ellis II

EMBIRICOS SHIPPING AGENCY LTD.

F. G. F. Embiricos (Chairman)
P. A. Embiricos-Coumoundourac (Greek)
H. M. Darker T. W. Jaques
W. J. Blinn A. G. Gounaris
T. A. Lency M. P. Inwood
T. E. Nott-Bower A. Regas
S. E. Tsakalotos K. I. Stylianou (Greek)

Commonwealth House
1-19 New Oxford Street
London WC1A 1NU

And at the Baltic

Telephone : 071-831 4388
Telex : 920688 Epembi G
Facsimile : 071-872 9385
Telegrams : Embiship London WC1
Registered in England No. 958112

Admiral Sid Wallace,
Dyer, Ellis, Joseph and Mills,
600 New Hampshire Avenue, NW.,
Suite 1000,
Washington, D.C., 20037,
USA

April 25th 1991

BY FAX 0101 202 944 3068 (& mail)

Dear Admiral Wallace,

I am writing to you on behalf of the Greek Shipping Co-operation Committee.

We understand that after the imminent publication of the Coast Guard's draft NPRM, the United States Coast Guard will be calling for representations not only on the question of certification but also on the general issue of insurance cover.

I would be grateful, in this connection, if you would please advise me the following:

1. Would you and Mr. Ellis be willing to accept instructions from the Union of Greek Shipowners and the Greek Shipping Co-operation Committee, to make representations to the Coast Guard, and possibly to Secretary Skinner as well, along the lines of the enclosed Memorandum, which outlines the UOS/GSCC position?
2. What would be the approximate cost that might be involved?
3. Do you consider that such representations would be of use?

I look forward to receiving your advices on the above and in the meantime extend my warmest regards.

Yours sincerely,



F. G. F. Embiricos

ECE/pd
cc John A. Hadjipateras, Esq.,
Chairman, G.S.C.C.
FAX (& Mail)

TAX 4 PAGES

RECEIVED
DEPT OF JUSTICE
MAY 22 10:05
FBI

OPA 90
UGS/GSCC POSITION

This memorandum outlines the position of the Union of Greek Shipowners and the Greek Shipping Cooperation Committee, which jointly represent some 50 million gross tons of shipping.

Shipowners who trade to the USA today, do so on a substantially uninsured basis as far as oil pollution liabilities are concerned. Such liabilities are unlimited, and in the case of the EXXON Valdez, amounted to billions of dollars, whereas insurance currently available to shipowners amounts to no more than some seven hundred million dollars.

Even this inadequate insurance, we are advised, is likely to be unavailable in the future.

The P&I Clubs provide the bulk of currently available commercial oil pollution insurance, namely US\$500,000,000. The provisions of OPA '90, however, the State laws currently being enacted by the various State Legislatures, the climate relating to the potential level of damages and fines which may be awarded by U.S. Courts and similarities with CERCLA legislation and decisions has resulted in the International Group's Reinsurance Contract being placed in jeopardy. Yet P&I oil pollution cover depends on the availability of reinsurance. Furthermore it is becoming increasingly difficult for the P&I Clubs to continue to write oil pollution cover for U.S. waters, without seriously undermining mutuality and equity amongst their membership.

Availability of oil pollution cover in the commercial markets, at Lloyds and elsewhere, is also becoming problematic. The perception exists, probably justifiably, that what, a few years ago, might have been an oil pollution incident of moderate cost, would today turn out, in the U.S.A., to be a multi million dollar incident. It is open to question whether the commercial insurance markets have the capacity to deal with this new reality. What is certain is that a series of expensive oil pollution incidents will result in current levels of oil pollution insurance becoming unavailable.

Thus, not only is commercial oil pollution insurance, where U.S. risks are involved, grossly inadequate, but the situation is likely to deteriorate materially. This is neither satisfactory for the shipowner, nor for the U.S. environment and claimants.

It is an unprofessional businessman who runs an uninsured business. Yet the current oil pollution regime in the U.S. has rendered all shipowners unprofessional, in as much as they are forced to operate substantially uninsured businesses. This, unfortunately, will have the tendency to discourage responsible behaviour and is therefore not in the interest of safety. It is unrealistic to expect shipowners to be, at the same time, reliable in avoiding oil pollution and unreliable in operating on an uninsured basis.

Thus the current U.S. oil pollution regime is inimical, not only to shipowners but also to the U.S. environment and to potential U.S. claimants.

The reason for the problem is that, as aforesaid, commercial insurance is unavailable to meet U.S. requirements, as they now are. Yet a solution does exist which would be to the benefit of all parties.

The solution lies in the necessary, adequate insurance being provided by the only party which can realistically do so, and has an interest in doing so. This party is of course the U.S. Government.

Were the U.S. Government to make available adequate oil pollution insurance, and provided the premia were charged on a per voyage basis, for example by means of an additional port charge, so that the said premia could be passed on by the shipowner to the charterer, it would be possible for the shipowner to pay a sufficient premium, so that the United States Government could provide billions of Dollars worth of insurance, without suffering any economic loss thereby. The United States Government is of course in a position to compel the payment of the necessary premium, prior to a vessel calling at a U.S. port, and can thereby ensure that the full cost of the insurance is passed on to the shipowner.

Such a solution should not be unattractive to the United States. It is environmentally friendly, in as much as it enhances the effectiveness of OPA '90 as well as recently enacted oil pollution legislation at State level. It will thereby safeguard the environment as well as U.S. oil pollution claimants, who today are at the mercy of the vagaries of the inadequate commercial insurance market. The proposed solution will furthermore be beneficial to U.S. trade and commerce, while at the same time being cost free to the U.S. Government, and will allow shipowners to operate in a professional and responsible manner.

The United States has, in any event, taken a step in this direction by the creation of the one-billion Dollar fund enacted under the provisions of OPA '90. This fund however is defective. It does not constitute insurance and it contains rights of recourse against the shipowner. Furthermore it relies on the continuity of the uncertain existing commercial insurance cover. It does not therefore address the problems outlined above. It would appear therefore that the proposal that the U.S. Government should provide adequate oil pollution insurance is a logical extension of current U.S. oil pollution legislation on both a Federal and State level.